

Ryan J. McCarthy, Bar #020571
Brian J. Ripple, Bar #033997
Arcangelo S. Cella, Bar #037176
JONES, SKELTON & HOCHULI P.L.C.
40 N. Central Avenue, Suite 2700
Phoenix, Arizona 85004
Telephone: (602) 263-1783
Fax: (602) 200-7878
rmccarthy@jshfirm.com
briple@jshfirm.com

Attorneys for Defendants City of Phoenix,
Joel Cottrell, Todd Blanc, Rudolfo Peru and
Ryan Hogan

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Sean Bennett, an individual,

Plaintiff,

v.

City of Phoenix, a governmental entity;
American Airlines, Inc., a foreign
corporation; Officer Joel Cottrell and Jane
Doe Cottrell, a married couple; Officer
Benjamin Denham and Jane Doe Benham
a married couple; Officer Todd Blanc and
Jane Doe Blanc, a married couple; Officer
Peru and Jane Doe Peru, a married couple;
Sergeant Hogan and Jane Doe Hogan, a
married couple,

Defendants.

No. CV-23-02425-ROS-DME

**OFFICER DEFENDANTS’
ASSENTED-TO MOTION TO
EXTEND DEADLINE FOR REPLY
IN SUPPORT OF MOTION TO
DISMISS**

Defendants Joel Cottrell, Todd Blanc, Rudolfo Peru, and Ryan Hogan (the
“Officer Defendants”), though undersigned counsel, move this Court to extend the deadline
for the Officer Defendants to file a reply in support of their Motion to Dismiss, Doc. 8,¹ to
January 16, 2024. The deadline for the Officer Defendants’ reply is currently January 9,
2024. Attorney Cella will be travelling internationally through January 3, 2024. In addition,

¹ The Motion to Dismiss was also filed on behalf of Defendant City of Phoenix,
which was a party at the time. Plaintiff voluntarily dismissed the City as a party on
December 19, 2023. *See* Doc. 14.

1 Attorney Cella is required to appear at a hearing on a motion for summary judgment in an
2 unrelated matter which was rescheduled for January 10, 2024. A one-week extension of
3 the deadline to file a reply in support of the Officer Defendants' Motion to Dismiss is
4 necessary to allow the Officer Defendants' counsel to fully address Plaintiff's Response to
5 their Motion. Undersigned counsel has conferred with Plaintiff's counsel, and Plaintiff
6 assents to the relief herein requested.

7 WHEREFORE, the Officer Defendants respectfully request that the Court
8 continue the deadline for them to file a reply in support of their Motion to Dismiss until
9 January 16, 2024.

10 DATED this 28th day of December, 2023.

11 JONES, SKELTON & HOCHULI, P.L.C.
12

13 By /s/ Arcangelo S. Cella
14 Ryan J. McCarthy
15 Brian J. Ripple
16 Arcangelo S. Cella
17 40 N. Central Avenue, Suite 2700
18 Phoenix, Arizona 85004
19 Attorneys for Defendants City of Phoenix,
20 Joel Cottrell, Todd Blanc, Rudolfo Peru
21 and Ryan Hogan
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of December, 2023, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

Sean A. Woods
Robert T. Mills
Mills & Woods Law, PLLC
5055 North 12th Street, Suite 101
Phoenix, Arizona 85014
Attorneys for Plaintiff

Taylor Allin
Wilson Elser Moskowitz Edelman & Dicker LLP
401 West A St., Ste. 1900
San Diego, CA 92101A
Attorney for Defendant American Airlines, Inc.

/s/ Lisa Drapeau